

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Proceeding by the Department of Telecommunications and Energy on its own Motion to Implement the Requirements of the Federal Communications Commission's Triennial Review Order Regarding Switching for Large Business Customers Served by High-Capacity Loops

D.T.E. 03-59

LIGHTSHIP TELECOM, LLC'S PETITION TO INTERVENE

Pursuant to 220 C.M.R. § 1.03, counsel for Lightship Telecom, LLC ("Lightship") hereby petitions the Department of Telecommunications and Energy ("Department") to intervene in the above-referenced proceeding, stating in support thereof the following:

1. Lightship is a Competitive Local Exchange Carrier ("CLEC") that provides local exchange, exchange access, interexchange telecommunications services to small, medium, and large size business customers throughout the Commonwealth of Massachusetts. In provisioning its services, Lightship utilizes Unbundled Network Elements ("UNEs") offered by Verizon-Massachusetts ("Verizon-MA"), especially a combination of loop, switching, and transport facilities (otherwise known as UNE-Platform or UNE-P) that are currently available to Lightship as UNEs pursuant to 47 U.S.C. § 251(c)(3).

3. On August 26, 2003, the Massachusetts Department of Telecommunications and Energy ("Department") initiated this 90 day proceeding to implement the FCC's Triennial Review Order regarding switching for large business customers served by high-capacity loops. On September 9, 2003, the Department held that the investigation will proceed based upon filings submitted by various CLECs on September 5, 2003.

4. Lightship requests that it be permitted to intervene as participant in this proceeding so that it may represent and protect its interests during it. Lightship will be substantially and specifically affected by the Department's review and decision in this docket because it is a customer and competitor of Verizon. At this time, Lightship relies on and its business plan is centered on using Verizon's UNE switching to serve large business customers with high capacity

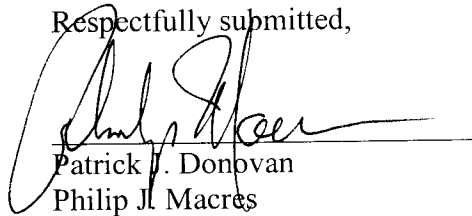
loops. Any changes to the availability of this UNE or the rates, terms and conditions in using it directly affect Lightship's ability to compete with Verizon. In this proceeding, Lightship seeks the opportunity to provide comments and possibly submit evidence that supports keeping the switching UNE available for large business customers served by high-capacity UNE loops. Because this UNE is critical to Lightship's business plan, Lightship's interests cannot be adequately represented without the Department granting this petition.

5. In making this request, Lightship asks that all communications and correspondence for this proceeding be directed to the undersigned counsel and the following individual at Lightship:

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WHEREFORE, Lightship respectfully requests that the Department grant it the right to intervene in this proceeding.

Respectfully submitted,



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Dated: September 15, 2003